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October 15, 2012

Sean Sheldrake
Project Coordinator
U.S. EPA, Region 10
1200 Sixth Avenue, M/S ECL-111
Seattle, Washington 98101

Re: September 2012 Monthly Progress Report
Administrative Settlement Agreement and Order on Consent for Removal Action
U.S. EPA Region 10 Docket No. CERCLA 10-2009-0255
Gasco Sediments Site within the Portland Harbor Superfund Site

Project Number: 000029-02.28

Dear Mr. Sheldrake:

This monthly progress report provides information required by Section VIII, Paragraph 26, of the Administrative Settlement Agreement and Order on Consent for Removal Action (Order) for actions taken in September 2012 at the Gasco Sediments Site within the Portland Harbor Superfund Site.

1. ACTIONS TAKEN IN THIS MONTH AND PROBLEMS ENCOUNTERED

The following actions and correspondences occurred in this month:

- **September 12** – Anchor QEA completed the third and final round of additional visual monitoring.
- **September 17** – Anchor QEA submitted the Gasco Sediments Site monthly progress report to EPA and conducted the first round of additional visual monitoring at the Gasco Sediments Site.
- **September 24** – Anchor QEA submitted a memorandum to EPA summarizing NW

Natural's review of the US Army Corps of Engineers memorandum as it relates to the nearby upstream Gasco Sediment Site.

- **September 27** – NW Natural received EPA's preliminary Gasco Sediments Site-specific comments on the Draft Engineering Evaluation/Cost Analysis (EE/CA). The comment letter identified that additional "placeholder comments" that are linked to the ongoing Portland Harbor Superfund Site draft Feasibility Study would be provided at a later date and that the Final EE/CA would not be required to be developed until resolution of these comments.
- **September 28** – Anchor QEA provided CDM Smith requested core logs adjacent to the U.S. Moorings dock area. Anchor QEA requested clarification from EPA on the required timeline for submittal of responses to EPA's preliminary comments on the Draft EE/CA. EPA clarified that responses to the September 27 comments should be submitted within 45 days of receipt of the comments, but the Draft EE/CA need not be revised prior to receipt of EPA's full set of comments.

2. RESULTS OF SAMPLING, TESTS, AND OTHER DATA RECEIVED

The results of the monthly visual monitoring of the shoreline area in the direct vicinity of the pilot cap are provided as Attachment A.

3. SCHEDULE OF ACTIVITIES FOR THE NEXT MONTH

Anchor QEA anticipates the following activities to occur in the next month:

- Submittal of the October monthly progress report.
- Completion of monthly visual monitoring of the shoreline area in the direct vicinity of the pilot cap area as well as the shoreline along the remainder of the Gasco Sediments Site due to the anticipated very low tidal elevations.
- Development of responses to EPA's preliminary comments on the Draft EE/CA
- Meeting with EPA to discuss the path forward process for finalization of the EE/CA and NW Natural's initial thoughts on EPA's preliminary comments on the Draft EE/CA.

4. ANTICIPATED PROBLEMS AND PROPOSED RESOLUTIONS

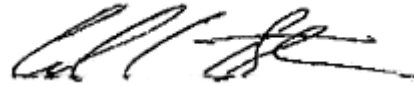
No problems or unforeseen conditions were encountered.

Please contact the undersigned if you have any questions or require additional information.

Sincerely,



Ryan Barth, P.E.
Assistant Project Manager



Carl Stivers, Partner
Project Manager

Attachments:

Attachment A Monthly Visual Monitoring Report for Pilot Cap Vicinity

Cc:

Bob Wyatt, NW Natural

Patty Dost, Pearl Legal Group PC

Tom McCue, Siltronic Corporation

Alan Gladstone and Hanne Eastwood, Davis Rothwell Earle and Xochihua

James Peale, Maul Foster Alongi, Inc.

Lance Peterson, CDM Smith

Matt McClincy, DEQ

Dana Bayuk, DEQ



Visual Observations Log Form

Date	<u>September 26, 2012</u>	Project Number:	<u>000029-02 BG-28 Task 4a</u>
Location:	<u>NW Natural "Gasco" Site</u>		
Project Name:	<u>NW Natural – Gasco</u>		
Monitoring Period:	<u>Monthly (Year 6)—Sept. 2012</u>		
Time Observations Started:	<u>September 26, 2012 @ 14:30</u>	Time Observation Concluded:	<u>September 26, 2012 @ 15:30</u>
Weather Conditions:	Clear, 70° Fahrenheit, winds from the west at approximately 5-10 knots		
Wave Action Observations:	Very light wave action (0.1 – 0.3 feet in height)		
Photographs Taken:	<input checked="" type="radio"/> Yes <input type="radio"/> No		

Tidal Conditions:	Willamette River level on 8/20/2012 ranged in elevation from 0.89 to 4.18 feet. The Willamette River level during photos was approximately 3.08 feet measured at 15:30 (River Level Elevation Datum: Morrison Gage Height).
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Observations of Erosion/Deposition:	No erosion/deposition is evident along the shoreline. Four organoclay mat material segments are exposed and visible. One 20-foot section of organoclay mat is visible at the upriver extent of the cap area. Two segments measuring 4-foot and 2-foot in length are exposed approximately 6 feet from the water's edge near the lateral mid-point of the cap area. One 40-foot section of organoclay mat material is exposed near the downriver extent of the cap area vertically to the shoreline (Photo 1).
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Observations of Long-term Controls (i.e., oil booms, organo-clay mat, etc.)	During the observation, the Fuel and Marine Marketing (FAMM) containment boom was in place across the cap area, between the upriver corner of the ship dock and the wooden dolphin (near the upriver extent of the site and near the Siltronic Corporation outfall). Buoys that identify the cap area to mariners are in place as installed. The position of the FAMM oil boom, warning buoys, and a general overview of the site shoreline is shown in Photo 2.
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Other Comments:	No sheen is evident in or around the cap area. Photo 3 shows the water surface and shoreline immediately downriver of the sediment cap.
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Recorded by:	Douglas Laffoon
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Photo 1- *Exposed section of organo-clay mat at the downriver extent of the sediment cap (9/26/12):*



Photo 2 - *FAMM oil boom shown and mariner warning buoys in place across pilot cap area. (9/26/12):*



Photo 3 — *Conditions immediately downriver of cap area (9/26/12):*

